



April 23, 2021

Via EFIS

Re: Sierra Club's Comments in Response to Evergy's Confidential March 26, 2021 Integrated Resource Planning Stakeholder Meeting, File Nos. EO-2021-0035, EO-2021-0036.

On March 26, 2021, Evergy held a confidential meeting regarding its 2021 triennial integrated planning resource ("IRP") process for Missouri stakeholders. Evergy also provided draft volumes of its IRP. During the March 26 stakeholder meeting, Evergy solicited comments by April 24, 2021. Since there are two IRP-related dockets open before the Missouri Public Service Commission ("Commission"), Sierra Club submits these comments in the dockets for the benefit of all stakeholders. However, because Evergy designated the stakeholder meeting, associated presentation, and some volumes of the draft IRP as confidential in their entirety, Sierra Club must submit most of these comments as confidential, even though the vast majority of its contents cannot reasonably be considered confidential. Sierra Club urges Evergy to more accurately differentiate between confidential and public information so that the public and Evergy's customers can more easily participate in processes that affect them.

Respectfully submitted,

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Metro, Inc.)
d/b/a Evergy Missouri Metro's)
2021 Triennial Compliance Filing) File No. EO-2021-0035
Pursuant to 20 CSR 4240-22)

In the Matter of Evergy Missouri)
West, Inc. d/b/a Evergy Missouri) File No. EO-2021-0036
West's 2021 Triennial Compliance)
Filing Pursuant to 20 CSR 4240-22)

**SIERRA CLUB'S COMMENTS IN RESPONSE TO EVERGY'S CONFIDENTIAL
MARCH 26, 2021 INTEGRATED RESOURCE PLANNING STAKEHOLDER
MEETING AND DRAFT IRP VOLUMES**

As explained more thoroughly below, Sierra Club offers the following findings on
Evergy's IRP planning:

(1) ** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(4) [REDACTED] **

(5) Evergy should reconsider the blanket confidentiality designations around this IRP stakeholder process to allow greater transparency and customer participation.

(6) Evergy should consider the public health impacts of generation portfolios as one decision metric in selecting a final preferred plan.

(7) Evergy should consider and plan to address the carbon goals of cities such as Kansas City, as well as corporations, in Evergy's service territory.

(8) Evergy should consider the comments of its individual customers who want 100% clean energy.

I. ** [REDACTED]

[REDACTED]

1 ** [REDACTED]

Contains information that Evergy has designated as confidential and protected from public disclosure.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**

V. Evergy Should Make as Much of Its IRP Available to the Public as Possible.

During its initial IRP stakeholder meeting in July 2020, Evergy promoted a public stakeholder process that fostered communication between the Company and its various stakeholders without the need for intervening in dockets (thereby necessitating lawyers) and non-disclosure agreements. Unfortunately, that changed during Evergy’s second stakeholder meeting, which Evergy designated confidential in its entirety. Blanket designations are not allowed by 20 CSR 4240-2.135(2), which sets criteria for confidentiality. Evergy should strive to remove the public information barriers of unnecessary confidentiality designations, closed meetings, and legal intervention requirements for information sessions so that more of its customers can participate in public engagement processes. Enabling broader stakeholder engagement can help the Company and the Kansas and Missouri Commissions to determine least-cost, least-risk evaluation criteria, input assumptions, and analysis structures. Moreover, akin to rate cases, Evergy should hold public engagement events and education sessions regarding the IRP to solicit input from stakeholders, especially those who do not routinely intervene in dockets, such as regular customers of the Company. As a best practice, the Company should utilize an independent facilitator to manage stakeholder challenges and education efforts. Sierra Club recently submitted extensive comments regarding public participation and transparency before the Kansas Corporation Commission, including letters and statements from the public. These comments concerned Evergy’s Sustainability Transformation Plan and IRP, and they are attached hereto as Exhibit A.

[REDACTED]

[REDACTED] **

Contains information that Evergy has designated as confidential and protected from public disclosure.

To provide a concrete example—Evergy should publicly disclose information about bids received in its recent RFP. On July 23, 2020, Sierra Club emailed Evergy and the Missouri stakeholder group the public results from RFPs conducted by Xcel Energy in Colorado and NIPSCO in Indiana.¹² Both NIPSCO and Xcel disclosed certain data to the public, and we encourage Evergy to do the same, which will increase transparency in its RFP and IRP processes. Specifically, we request that Evergy release the identities of bidders, the number of bids received by resource type and state, and the total amount of capacity of received bids by resource type, average bid price, and pricing unit. In addition, Evergy should provide detailed information on each bid with the bidder’s name redacted. Evergy has as of yet failed to provide transparency around the bids received in its April 2020 RFP.

VI. Evergy Should Include Public Health Impacts in Its Assessment of Preferred Portfolios in its 2021 IRP.

As discussed in Sierra Club’s May Annual Update Comments and July 31, 2020 Stakeholder Comments, electricity generation through the burning of fossil fuels, especially coal, has undeniable negative impacts on public health. Compliance with Missouri IRP Rules requires consideration of pollutants, including air emissions,¹³ and we urge Evergy to include quantified health impacts of each portfolio in its triennial IRP process. Evergy should evaluate the cost that various air pollutants, including, but not limited to, sulfur dioxide, nitrous oxide, particulate matter, and mercury, have on public health, which include increased instances of asthma attacks, respiratory infections, hospital admissions, missed school and work days, and a variety of other health problems.¹⁴ Air pollution contributes significantly to increased morbidity and mortality, and existing modeling tools can be used to translate air pollution into social cost estimates.

Moreover, Missourians continue to face an unprecedented time during the COVID-19 pandemic, and the COVID-19 pandemic has confirmed the direct connection between air pollution and public health harm. One study found that “higher historical PM_{2.5} exposures are positively associated with higher-county level COVID-19 mortality rates” when assessing long-

¹² Xcel Energy, Public Service Company of Colorado, 2017 All Source Solicitation 30-Day Report (Dec. 28, 2017), *available at* <https://assets.documentcloud.org/documents/4340162/Xcel-Solicitation-Report.pdf>;

¹³ 20 CSR 4240-22.060(4)(B)7.

¹⁴ *See, e.g.*, EPA, Sulfur Dioxide Basics, *available at* <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics> (summarizing public health harms from SO₂); *see also* EPA, Ground-level Ozone Basics, *available at* <https://www.epa.gov/ground-level-ozone-pollution/ground-level-ozone-basics#effects> (summarizing public health harms from ozone).

term exposure to air pollution's impact on the severity of COVID-19 health outcomes.¹⁵ As the pandemic persists, data reveal that COVID-19 is impacting Black, Indigenous, Latinx, and people of color most.¹⁶ It is well known that these are the very same communities that also disproportionately bear the brunt of air pollution,¹⁷ and the Center for Disease Control and Prevention warns that people with asthma, respiratory diseases, and various other health problems, many of which are exacerbated by air pollution and coal combustion, might be at an increased risk for severe illness from COVID-19.

Evergy should consider the environmental justice implications associated with its ultimate selection of its preferred portfolio because the communities that are harmed most by persisting reliance on coal-burning power plants are the communities who should benefit the greatest from reduced emissions, coal retirements, and investments in renewable energy. Despite Evergy's claim that "no additional public health assessment is needed to evaluate alternative plans,"¹⁸ and that customer public health is not an appropriate issue to consider in this process,¹⁹ Evergy cannot simultaneously claim to be acting in the best interests of its customers if the Company does not evaluate how resource plans directly impact them. Evergy should take care to consider the distinct communities whose health is affected by the continued operation of Evergy's coal-burning units. To put a finer point on the matter, if two ARPs are closely ranked on cost and customer price risk, and one causes less public health harm, Evergy should select the ARP that contributes to fewer deaths and asthma attacks in the communities it serves.

¹⁵ Wu, X., Nethery, R. C., Sabath, M. B., Braun, D. and Dominici, F., 2020. Air pollution and COVID-19 mortality in the United States: Strengths and limitations of an ecological regression analysis. *Science advances*, 6(45), p.eabd4049, available at <https://projects.iq.harvard.edu/covid-pm>.

¹⁶ The COVID Tracking Project, The COVID Racial Data Tracker, available at: <https://covidtracking.com/race>.

¹⁷ Holden, Emily, *Air pollution remains worst in US communities of color despite progress*, The Guardian (July 30, 2020), available at <https://www.theguardian.com/environment/2020/jul/30/air-pollution-worst-us-communities-of-color-study>; Colmer, J., et. al., *Disparities in PM2.5 air pollution in the United States*, *Science* Vol 369, Issue 6503 (July 31, 2020), available at <https://science.sciencemag.org/content/369/6503/575>.

¹⁸ Evergy Missouri West and Evergy Missouri Metro's Response to Suggested Special Contemporary Issues at 8 (Oct. 8, 2020).

¹⁹ Laura Becker, Manager, Res. Plan., Evergy Stakeholder Presentation (Oct. 19, 2020).

VII. Evergy Must Consider Municipal Clean Energy Goals in Its Triennial IRP, and Should Consider Corporate Clean Energy Goals As Well.

In this IRP, Evergy should evaluate and adopt pathways to helping the communities that it serves achieve their climate goals. The Commission has required Evergy to “analyze and develop as candidate resource options the satisfaction of municipal and corporate renewable energy goals, particularly the plan of Kansas City which, when enacted into law by ordinance, may become a legal mandate within the meaning of 20 CSR 4240-22.060(3)(A).”²⁰ Evergy is well-positioned to rapidly increase investments in wind and solar and could easily meet municipal and corporate clean energy goals many times over. Consequently, we view the Commission’s requirement to consider these goals as a bare minimum for renewables deployment but one that Evergy should address in its upcoming triennial IRP.

Kansas City has strong history in the areas of climate and clean energy policy. Resolution 180475 was adopted by the City Council of Kansas City in July 2018, stating that “the City has a responsibility to its residents, the country, and the world, to accelerate the transition to 100% clean, renewable energy” and committing the Mayor and Council to “supporting a communitywide goal of 100% clean renewable energy as soon as possible.”

On May 14, 2020, the City Council of Kansas City adopted a new resolution by a 10–1 vote, including support from Mayor Quinton Lucas, strengthening the City’s climate and clean energy commitments. Resolution 200005 (Exhibit B) establishes, among other things:

- 1) That the City “reaffirms that climate protection and greenhouse gas reduction should be key factors in all decisions and actions by the City.”
- 2) A goal of reducing greenhouse gas emissions from municipal operations from 2005 levels by 100% by 2022 for emissions related to electricity consumption.
- 3) A goal of reducing citywide greenhouse gas emissions from 2005 levels by 100% by 2030 for emissions related to electricity consumption.

In addition to considering the above resolutions, Evergy should consider the importance of individual Mayoral pledges that support clean energy. Attached are two Mayors for Clean Energy pledges (Exhibit C) made in recent months from Mayor Quinton Lucas of Kansas City and Mayor Bill McMurray of St. Joseph. Mayors for Clean Energy is a Sierra Club program where Mayors pledge support for transitioning to 100% clean, renewable energy in their city and across the United States.

Evergy should also consider the goals of Climate Action KC. Climate Action KC’s website states that it is a “Coalition made up of more than 100 local and state elected officials, and leaders from many significant civic, nonprofit, public and corporate organizations.” In March, 2021, Climate Action KC adopted a Climate Action Plan (Exhibit D) that includes multiple goals of moving the Kansas City region to 100% clean energy, such as:

²⁰ PSC Order Establishing Special Contemporary Resource Planning Issues, File No. EO-2020-0046, paragraph J (Oct. 30, 2019).

- 1) Net zero GHG emissions for energy generation by 2035 (page 45).
- 2) Electricity used by area municipalities will be powered through 100% renewable energy by 2035 (page 50).
- 3) Area electric utilities will be net-zero carbon by 2035 (page 50).
- 4) Achieve net zero greenhouse gas emissions for all city/county operations by 2030 (page 51).

In addition, many corporations that do business in Evergy's service territory have corporate renewable energy goals as well. If Evergy has not already, we urge the Company to conduct thorough research among its commercial and industrial customer base to determine those corporate clean energy goals and consider them as required by the Commission's orders mentioned above. An organization called RE 100,²¹ which is a coalition of "[t]he world's most influential companies, committed to 100% renewable power" is an excellent resource that Evergy could utilize in this research.

VIII. Evergy Should Consider the Comments of Individual Customers Who Want 100% Clean Energy From Their Utility.

Lastly, attached is digital petition letter to Evergy urging the company to phase out its coal generation by 2030, replace it with clean energy and refrain from investing in new gas generation. *See* Exhibit E. The letter calls on Evergy to prioritize clean energy access for all and eliminate public health impacts and costs, especially to at-risk populations. The letter was signed by 129 Missourians, 38 of whom added personalized comments, and those are presented at the top of the list of signers.

Respectfully submitted,

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²¹ *See* <http://there100.org/companies>.

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